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Attorneys for Plaintiffs/Counter-Defendants

**IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

iBeauty Limited Company, Dongguan
Xianghuo Trading Co., Ltd., Dongguan
Laiyang Trading Co., Ltd., Guangzhou
Linyu Trading Co., Ltd., Guangzhou
Linan Electronic Technology Co., Ltd.,
and Guangzhou Senran Electronic
Technology Co., Ltd.,

Plaintiffs/Counter-Defendants,

v.

Dbest Products, Inc.,

Defendant/Counterclaimant.

Case No. 2:24-cv-10694-MWC-JC

**STIPULATION FOR ADDITIONAL
DISCOVERY DATES**

Hon. Judge Michelle Williams Court

Plaintiffs iBeauty Limited Company, Dongguan Xianghuo Trading Co., Ltd.,
Dongguan Laiyang Trading Co., Ltd., Guangzhou Linyu Trading Co., Ltd.,
Guangzhou Linan Electronic Technology Co., Ltd., and Guangzhou Senran
Electronic Technology Co., Ltd (“Plaintiffs”) and Defendant Dbest Products, Inc.
 (“Defendant” and collectively referred to herein with “Plaintiffs” as the “Parties”),
hereby propose the following schedule for discovery deadlines, pre-trial conference,

1 and trial with additional dates for Patent Claim Construction and Invalidity
2 Contentions and Hearing incorporated into the regular proposed schedule:

3 August 1, 2025: Disclosure of Asserted Claims and Infringement
4 Contentions (N.D. Patent L. R. 3-1)

5 August 1, 2025: Initial Disclosures Due

6 August 29, 2025: Last Day to Amend Pleadings/Add Parties

7 September 15, 2025: Invalidity Contentions (N.D. Patent L. R. 3-3)

8 September 29, 2025: Exchange of Claim Terms for Construction (N.D. Patent
9 L. R. 4-1)

10 October 20, 2025: Exchange Proposed Constructions and any Extrinsic
11 Evidence relevant to Proposed Construction (N.D.
12 Patent L. R. 4-2)

13 November 14, 2025: Joint Claim Construction and Prehearing Statement and
14 Expert Reports (N.D. Patent L. R. 4-3)

15 December 12, 2025: Completion of Claim Construction Discovery (N.D.
16 Patent L. R. 4-4)

17 December 29, 2025: Opening Claim Construction Brief (N.D. Patent L. R.
18 4-5(a))

19 January 12, 2026: Responsive Claim Construction Brief (N.D. Patent L. R.
20 4-5(b))

21 January 19, 2026: Reply Claim Construction Brief (N.D. Patent L. R.
22 4-5(c))

23 February 2, 2026: Claim Construction Hearing (N.D. Patent L. R. 4-6)

24 August 7, 2026: Fact Discovery Cut-Off

25 August 14, 2026: Expert Initial Disclosures & Reports Due

26 August 28, 2026: Expert Rebuttal Disclosure & Reports Due

27 September 11, 2026: Expert Discovery Cut-Off
28

November 13, 2026: Motion Hearing Cut-Off (Last day to hear any Motions,
including dispositive motions)

January 8, 2027: Trial Filings (First Round)

January 22, 2027: Trial Filings (Second Round)

February 5, 2027: Final Pre-Trial Conference Hearing

February 24, 2027: **Trial**

Dated: July 3, 2025

Respectfully submitted,

ORBIT IP, LLP

BAYRAMOGLU LAW OFFICES LLC

/s/ Ehab M. Samuel

/s/ David Silver

Ehab M. Samuel

David Silver

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ATTESTATION PURSUANT TO LOCAL RULE 5-4.3.4(2)(i)

Pursuant to Local Rule 5-4.3.4(2)(i), I, David Silver, attest that all other signatories listed and on whose behalf the filing is submitted concur in this filing's content and have authorized this filing.

/s/ David Silver

David Silver

CERTIFICATE OF SERVICE

I, hereby certify that on July 3, 2025, I electronically filed the foregoing with the Court using the CM/ECF system, and thereby delivered the foregoing by electronic means to all counsel of record.

/s/ *David Silver*

David Silver

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